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February 15, 2024

Honorable Lorna G. Schofield  
United States District Judge  
United States District Court for the Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Ezrasons, Inc. v. The Travelers Indemnity Company 1:21-cv-03165-LGS**

Dear Judge Schofield:

Plaintiff Ezrasons, Inc. (“Ezrasons” or “Plaintiff”) and Defendant The Travelers Indemnity Company (“Travelers” or “Defendant”) jointly submit this letter pursuant to the Court’s January 18, 2024 Memo Endorsement (ECF 40) on Travelers’ January 17, 2024 letter to the Court (ECF 39).

The Parties were unable to agree on a proposed Order of Judgment, and do not agree on the amount of costs this Court should award to Plaintiff. Nor do the Parties agreed on how to proceed.

Plaintiff proposes that this Court enter judgment in favor of Plaintiff as Plaintiff set forth in its letter to this Court dated February 13, 2024 (ECF 42). Defendant, per its letter dated February 15, 2024 (ECF 43), proposes discrete discovery from Plaintiff to allow the Court to determine whether or not Plaintiff is actually entitled to the \$350,000 that it claims.

Respectfully submitted,

K&L Gates LLP

/s/ Frederic J. Giordano

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